## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

COLE'S WEXFORD HOTEL, INC., on its own behalf and on behalf of all others similarly situated,

Civil Action No. 2:10-cv-01609-JFC

Plaintiffs,

v.

**ELECTRONICALLY FILED** 

HIGHMARK INC.,

Defendants.

## <u>PLAINTIFF'S MOTION FOR REIMBURSEMENT OF EXPENSES, AN AWARD OF</u> ATTORNEYS' FEES, AND FOR SERVICE PAYMENT TO CLASS REPRESENTATIVE

Plaintiff Class Representative, Cole's Wexford Hotel, Inc. ("Plaintiff"), through its undersigned respective counsel ("Settlement Class Counsel"), upon the accompanying brief filed this same day, and all supporting declarations and exhibits, respectfully move this Court for entry of an Order, approving: (1) reimbursement of expenses in the amount of \$3,084,546; (2) an award of attorneys' fees in the amount of 32% (\$2,400,000) of the Settlement Fund to Settlement Class Counsel; and for (3) a service payment to Plaintiff in the amount of \$7,500, payable from the Settlement Fund.

Dated: March 12, 2020

/s/ Hamish Hume

Hamish Hume (pro hac vice) Melissa Felder Zappala (pro hac vice) Josh Riley (pro hac vice)

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